IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO Western Division

PACE LOCAL UNION 5-1967, et al.)
Plaintiffs,)
v.) Case No. C-1-01 301
INTERNATIONAL PAPER COMPANY,)
Defendant.)))

JOINT MOTION FOR EXTENSION OF TIME TO FILE RESPONSES TO OBJECTIONS TO THE MAGISTRATE'S REPORT AND RECOMMENDATION

Due to the voluminous nature of Plaintiffs' Objections to the Magistrate's Report and Recommendation and outstanding obligations of Plaintiff's counsel, the parties jointly move the Court for an Order extending until February 6, 2004 the time by which the parties must file their respective responses to objections to the Magistrate's Report and Recommendation.

Respectfully submitted,

INTERNATIONAL PAPER COMPANY

/s Michael A. Roberts______Counsel

Michael Roberts, Esq. **Graydon Head & Ritchey, LLP**1900 5th 3rd Center
511 Walnut Street
Cincinnati, Ohio 45202
(513) 629-2799

W. Carter Younger, Esq. (admitted *pro hac vice*)
Vincent J. Miraglia, Esq. (admitted *pro hac vice*)

McGuireWoods LLP

1050 Connecticut Avenue
Washington, DC 20036
(202) 856-1704

PACE LOCAL UNION 5-1967, et al.

<u>/s Robert Doggett by Michael Roberts, per authority 1/22/03</u> Counsel

Robert I. Doggett 6740 Clough Pike Cincinnati, OH 45244

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been mailed first class, postage prepaid, this 23rd day of January 2004 to: Robert I. Doggett, 6740 Clough Pike, Cincinnati, OH 45244.

/s Michael A. Roberts___